

**STATE OF INDIANA
INDIANA UTILITY REGULATORY COMMISSION**

**PETITION OF NORTHERN INDIANA PUBLIC)
SERVICE COMPANY LLC PURSUANT TO IND. CODE)
§§ 8-1-2-42.7, 8-1-2-61 AND, IND. CODE § 8-1-2.5-6 FOR)
(1) AUTHORITY TO MODIFY ITS RATES AND)
CHARGES FOR ELECTRIC UTILITY SERVICE)
THROUGH A PHASE IN OF RATES; (2) APPROVAL)
OF NEW SCHEDULES OF RATES AND CHARGES,) CAUSE NO. 45159
GENERAL RULES AND REGULATIONS, AND)
RIDERS; (3) APPROVAL OF REVISED COMMON AND)
ELECTRIC DEPRECIATION RATES APPLICABLE TO)
ITS ELECTRIC PLANT IN SERVICE; (4) APPROVAL)
OF NECESSARY AND APPROPRIATE ACCOUNTING)
RELIEF; AND (5) APPROVAL OF A NEW SERVICE)
STRUCTURE FOR INDUSTRIAL RATES.)**

PETITION TO INTERVENE OF SIERRA CLUB

Sierra Club, by counsel, respectfully requests, pursuant to 170 I.A.C. 1-1.1-11, that the Commission allow it to intervene and become a party to this Cause. In support of its Petition, Sierra Club would show the Commission:

1. Sierra Club is a membership organization with over 10,000 members in Indiana. Sierra Club operates as a non-profit corporation and its principal office is 2101 Webster Street, Suite 1300, Oakland, California, 94612. Its telephone number is (415) 977-5500. Sierra Club's Indiana office is located at 1100 West 42nd Street, Suite 218, Indianapolis, Indiana, 46208. Its Indiana office's telephone number is (317) 822-3750.

2. The name, address, and telephone number of counsel for Sierra Club is:

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Parties and Commission staff wishing to serve papers on counsel for Sierra Club in this Cause should use the address above.

3. In this proceeding, Northern Indiana Public Service Company (“NIPSCO” or the “Company”) has filed a general electric rate case. NIPSCO states that it is seeking a total revenue increase of \$21 million per year or 1.4% over NIPSCO’s current retail revenues. According to NIPSCO witness Gaske, if NIPSCO’s proposed rates are approved, the average residential customer will experience increase in its monthly bill of \$11.42 or 12.1 percent. NIPSCO is proposing to modify its depreciation rates for coal-burning generating plants to reflect their useful life as reflected in NIPSCO’s recently filed Integrated Resource Plan. NIPSCO is proposing a \$3 per month increase of the fixed customer charge for residential electrical service.

4. Sierra Club seeks to intervene in this Cause to protect its and its members’ substantial interests in the Company’s proposed rates for electric service. Sierra Club includes among its Hoosier members many people and families who are residential retail customers of NIPSCO and have a substantial interest in the proceeding. They pay NIPSCO rates and charges for residential electric service, which this proceeding will impact if NIPSCO receives approval to increase its rates. Further, the Company’s request for approval for an increase to the fixed residential customer charge and for a change in the depreciation schedule for coal-burning plants will impact Sierra Club’s members. Sierra Club therefore has a substantial interest in this proceeding to protect the interests of its members.

5. Sierra Club seeks full intervention in order to ensure that its interests in lower cost and cleaner energy options are fully represented, and to bring to this proceeding its expertise in

electric utility matters. In terms of the positions it will advance here, Sierra Club's intervention will focus on whether NIPSCO's proposed rate increase is justified.

6. No other party can adequately represent the substantial interests of Sierra Club and its members in this proceeding. Further, the addition of Sierra Club as a party to this Cause will not unduly broaden the issues or otherwise burden the proceedings. Sierra Club understands that it is bound by all rulings and other matters of record before the time that this Petition is granted, and will take this case as it exists as of the date of intervention. This Petition to Intervene is being filed more than five days before the date set for the initial evidentiary hearing on the merits in this proceeding.

7. For the foregoing reasons, Sierra Club respectfully requests that the Commission grant it leave to intervene and make Sierra Club a party to this proceeding. The undersigned Kathryn A. Watson has been duly authorized to file this Petition to Intervene with the Commission on behalf of Sierra Club.

Respectfully submitted,

/s/ Kathryn A. Watson
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was served by electronic mail this

28th day of November, 2018, to the following:

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